

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Andrew B. Austin, Plaintiff, v. LexisNexis Risk Solutions Inc., Defendant.	Case No.: 23-cv-00869-JMB-JFD JOINT STIPULATION AND MOTION TO EXTEND COURT CASE DEADLINES
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Plaintiff Andrew B. Austin and Defendant LexisNexis Risk Solutions Inc, by and through their respective undersigned counsel, jointly stipulate and request under Federal Rule of Civil Procedure 16.02 that the Court amend its August 24, 2023, Amended Pretrial Scheduling Order by extending all deadlines sixty days as provided below.

Under Local Rule 16.3(b), a party moving to modify a scheduling order must “establish good cause for the proposed modification; and (2) explain the proposed modification’s effect on any deadlines.” D. Minn. LR 16.3(b)(1-2). Good cause exists to modify this Amended Scheduling Order. Plaintiff and Defendant have been diligently conducting discussions regarding the protective order and motion practice related thereto which was disrupted due to travel schedules and the holidays. The parties finally have worked out a permissible purpose order that meets the needs of the case and will be filing that before January 11, 2024. No later than January 18, 2024, Defendant will produce the documents related to Andrew T. Auston and no later than February 1, 2024, Plaintiff will make a settlement demand. Defendant will then respond to Plaintiff’s demand by February

8, 2024, and if the parties are unable to resolve the case on their own by February 15, 2024, they will contact the Court and request a settlement conference (which was originally scheduled for October 19, 2023, *see* Doc. No. 14). The parties will continue working together regarding discovery and related discovery issues, various subpoenas to third parties, in addition to the completion of party depositions.

The Parties move to extend all the Court deadlines by sixty days.

The current deadlines the parties seek to extend are as follows. *See Doc. No. 17.*

- a. Fact Discovery Completion Deadline: February 1, 2024, to April 1, 2024
- b. Non-Dispositive Motion Deadline to Serve and File: March 1, 2024, to May 1, 2024.
- c. Dispositive Motion Deadline to Serve and File: April 15, 2024, to June 15, 2024.
- d. Trial Ready Date: August 15, 2024 – remains as is subject to the Court's preference.

Should the Court wish for more details, the Parties are amenable to a conference to discuss the matter further.

For the reasons stated above, and in the interest of judicial economy, the parties therefore respectfully ask the Court to:

- Extend the current case deadlines by sixty days save and except the Trial Ready Date as indicated above.

CONSUMER JUSTICE CENTER, P.A.

Dated: January 21, 2024

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Dated: January 21, 2024

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